

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

JOSEPH MORGAN,)
Plaintiff,) Case No.: 1:23-cv-06107
vs.) Judge Kocoras
SILVER FINANCIAL CAPITAL, INC.,)
Defendant.)

PLAINTIFF JOSEPH MORGAN'S ITEMIZATION OF FEES

Pursuant to this Court’s Order of November 29, 2023 (ECF 16), Plaintiff Joseph Morgan (“Plaintiff”) submits the following itemization of fees incurred in connection with his Motion to Remand and for Attorney’s Fees (“Motion to Remand”) (ECF 6):

Date	Task	Staff	Duration (hrs.)	Rate	Charge
August 28, 2023	Prepare draft Motion to Remand, research regarding same	Matthew Goldstein	1.8	\$360	\$648.00
August 28, 2023	Revise draft Motion to Remand	Daniel A. Edelman	1	\$700	\$700.00
October 9, 2023	Prepare Reply in Support of Motion to Remand	Matthew Goldstein	.3	\$360	\$108.00
October 9, 2023	Review Reply in Support of Motion to Remand, approve filing same	Tara Goodwin	.1	\$600	\$60.00
October 9, 2023	Circulate Reply in Support of Motion to Remand for approval to file, file same	Daniele Mazar (paralegal)	.2	\$125	\$25.00
October 27, 2023	Prepare Second Reply in Support of Motion to Remand	Daniel A. Edelman	1.5	\$1,050	\$1,050.00
October 28, 2023	Revise Second Reply in Support of Motion to Remand, research regarding same	Daniel A. Edelman	1	\$700	\$700.00
October 29, 2023	Review Second Reply in Support of Motion to Remand, approve filing same	Tara Goodwin	.1	\$600	\$60.00

October 30, 2023	Prepare Appendix to Second Reply in Support of Motion to Remand	Daniele Mazar	.1	\$125	\$12.50
October 31, 2023	Circulate Second Reply in Support of Motion to Remand for approval to file, filed same	Daniele Mazar	.2	\$125	\$25.00
			Total Charge:	\$3,388.50	

The above hourly rates are the usual and customary rates charged for each of the above individuals. As reflected above, Plaintiff's counsel has incurred \$3,388.50 in attorney's fees in connection with his Motion to Remand (ECF 6), and respectfully requests that the Court award him \$3,388.50. Plaintiff attaches the Declaration of Daniel A. Edelman ([Exhibit A](#)) in support of his request. Plaintiff does not request that the Court award any costs.

Respectfully submitted,

/s/ Daniel A. Edelman
Daniel A. Edelman

Daniel A. Edelman
Tara L. Goodwin
Matthew J. Goldstein
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CERTIFICATE OF SERVICE

I, Daniel A. Edelman, hereby certify that on Tuesday, December 12, 2023, I caused a true and accurate copy of the foregoing document to be filed via the court's CM/ECF online system, which sent notice via email to all counsel of record.

/s/ Daniel A. Edelman

Daniel A. Edelman

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Matthew J. Goldstein
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